

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

XIONG PAO VANG,

Defendant.

09 SEP -9 P2:00

Case No. 09-CR-

[18 U.S.C. §§ 922(a)(6) and (g)(9),
924(a)(1)(A) and (a)(2)]

Green Bay Division

09 CR-227

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about February 16, 2009, in Outagamie County, in the State and Eastern District of Wisconsin,

XIONG PAO VANG,

in connection with the attempted acquisition of a firearm from Scheels All Sports, a federally licensed firearms dealer, did knowingly make a false statement, which was intended to deceive and likely to deceive Scheels All Sports as to a fact material to the lawfulness of the sale and disposition of such firearm under the provisions of Chapter 44 of Title 18, United States Code, and the regulations thereunder.

2. In particular, in connection with the attempted purchase of a 9mm Springfield pistol, model XD, serial number US109592, Xiong Pao Vang falsely stated on the Firearms Transaction Record (ATF Form 4473) that he had not been convicted of a misdemeanor crime of domestic violence, when, in fact, Vang had been convicted in the State of Wisconsin of Battery on August 31,

1999 in Winnebago County Case No. 1999CM001446.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about February 16, 2009, in Outagamie County, in the State and Eastern District of Wisconsin,

XIONG PAO VANG,

in connection with the attempted acquisition of a firearm, did knowingly make a false statement and representation with respect to information required to be kept in the records of Scheels All Sports, a federally licensed firearms dealer, under the provisions of Chapter 44 of Title 18, United States Code, and the regulations issued thereunder.

2. In particular, in connection with the attempted purchase of a 9mm Springfield pistol, model XD, serial number US109592, Xiong Pao Vang falsely stated on the Firearms Transaction Record (ATF Form 4473) that he had not been convicted of a misdemeanor crime of domestic violence, when in fact, Vang had been convicted in the State of Wisconsin of Battery on August 31, 1999 in Winnebago County Case No. 1999CM001466.

All in violation of Title 18, United States Code, Sections 924(a)(1)(A).

COUNT THREE**THE GRAND JURY FURTHER CHARGES:**

1. On or about March 9, 2009, in Outagamie County, in the State and Eastern District of Wisconsin,

XIONG PAO VANG,

who previously had been convicted of a misdemeanor crime of domestic violence, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm was a Sig Sauer, model Mosquito, .22 caliber pistol, Serial Number F034779.

3. At the time of the offense, the defendant had been convicted in the State of Wisconsin of Battery on August 31, 1999 in Winnebago County Case No. 1999CM001446, a misdemeanor crime of domestic violence.


All in violation of Title 18, United States Code, Sections 924(g)(9) and (a)(2).

FORFEITURE NOTICE

All property of the defendant used or intended to be used to commit or facilitate the commission of the violation alleged in Count Three is subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 21, United States Code, Section 853. Such property includes, but is not limited to, the following:

a. One .22 caliber Sig Sauer pistol, model Mosquito, Serial Number F034779 seized from the defendant's residence on or about March 9, 2009.

A TRUE BILL:


FOREPERSON

Date: 9/9/09



MICHELLE L. JACOBS
United States Attorney